



Tribal Council Chairman
Benjamin Joseph

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April 18, 2019

The Honorable John Horgan
Office of the Premier
P.O. Box 9041 STN PROV GOVT
Victoria, BC V8W9E1 Canada

Re: Giant Copper mine #0700195 Notice of Work application
Referral Number: 109994684-011

Dear Premier Horgan,

We oppose a Notice of Work application for exploratory mining in the upper Skagit River watershed at the Giant Copper property, mine number 0700195 an ecologically sensitive headwaters of a river with some of the most productive salmon runs remaining in Puget Sound. The applicant, having a disastrous record of contamination elsewhere, has not followed British Columbia's requirements for consultation with First Nations and affected communities.

Copper "is neurotoxic to the chemosensory systems of fish and other aquatic species." Minute amounts of copper, in conditions analogous to the legacy of mining operations, can affect a juvenile coho's sense of smell so much that it fails to recognize predators.

The applicant, after negligently disregarding geologic studies, built a tailings dam with an unstable foundation at its Mount Polley dam in central British Columbia. The company, Imperial Metals Corporation, has since at least 2011 operated its mine tailings pond beyond capacity. In 2014, the dam for the tailings pond breached and released a 4-square-kilometer pond – billions of gallons of water and slurry from gold and copper tailings – contaminating a creek and Quesnel Lake, once "the world's cleanest deep-water lake" according to the Williams Lake Tribune.

Productive salmon runs downstream on the Fraser River were needlessly threatened with heavy metals accumulation. The effects will likely linger for decades, making this one of the larger environmental disasters in modern Canadian history. The Sauk-Suiattle Indian Tribe has direct experience with the legacy of contamination left behind by industrial mining in wilderness headwaters.

The Sah-ku-mehu, since time immemorial, while engaged in seasonal harvests of returning adult salmonids, occupied villages riparian to rivers and streams, not limited to, but including the Skagit and Stillaguamish river basins. We are a canoe people, often traveling downriver to Puget Sound where we harvest fish and shellfish.

Beginning in the late 1890s, numerous mines constructed by non-Indians dotted the headwaters basins of the South Fork Sauk River above the mining town of Monte Cristo. More than a century later, Monte Cristo was named a Superfund site because of storm runoff flowing through tailings piles at the mine entrances that were spilling heavy metals into the South Fork of the Sauk River. The mining company was ordered to pay millions of dollars as part of a huge federal and state cleanup effort, that also required the ongoing monitoring of water quality. Sediments in important fish habitat miles downstream have elevated levels of arsenic.

Imperial Metals, exploring for metals in the Skagit River headwaters, would irreparably damage the water quality of the Skagit River, one of the few remaining watersheds in Puget Sound that still has wild stocks of all five species of salmon. The seasonal harvest of returning adult salmonids is central to the religious, spiritual, cultural and commercial wellbeing of the Sauk-Suiattle Indian Tribe and its members. In the interests of protecting a natural resource treasure valued by natives and non-natives alike, we would urge your government to incorporate the doughnut hole between Manning and Skagit Valley Provincial Parks, into that park complex.

Concomitantly, the international treaty that administers this area requires the Skagit Environmental Endowment Commission (SEEC) "to acquire mineral rights consistent with conservation and recreation purposes." We urge the Ministry of Mines and the BC Government to push for this outcome so that the hole in these parks can be filled and the threat to our Tribal headwaters can be abated. The treaty is evidence of the working relationship between the United States and Canada on the environmental issues of this area, and that relationship should be respected.

In the Ministry's "Guide to Processing a Mine Project Application Under the British Columbia Mines Act," Chapter 5, Section 4.4 describes "Notification Requirements for New Applications." "Proactive consultation by the proponent with agencies, First Nations, locally affected communities and the public will assist in identifying and addressing potential concerns related to the proposed mine." It is unacceptable that in the Notice of Work application for the exploratory mining on the Giant Copper property, the Imperial Metals Corporation admitted that it did not share information and engage with First Nations.

Sincerely,



Benjamin Joseph, Chairman
Sauk-Suiattle Indian Tribe

Cc:

Honorable Stewart Phillip, President, Union of BC Indian Chiefs
Honorable Jay Inslee, Governor, State of Washington
Honorable Patty Murray, United States Senator, State of Washington
Honorable Maria Cantwell, United States Senator, State of Washington
British Columbia Minister of Energy, Mines, and Petroleum Resources Michelle Mungall
Seattle City Light
Skagit Environmental Endowment Commission
Brian Cladoosby, Chairman, Swinomish Indian Tribe
Jennifer Washington, Chair, Upper Skagit Indian Tribe

References

McIntyre, J.K., Baldwin, D.H., Beauchamp, D.A., Scholz, N.L., "Low-level copper exposures increase visibility and vulnerability of juvenile coho salmon to cutthroat trout predators," Ecological Applications, 22(5), 2012, pp. 1460-1471